

District Judge James L. Robart

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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 CITY OF SEATTLE,

13 Defendant.

Case No. C17-01282 JLR

MOTION TO STAY PENDING
DEADLINES

**Noted on Motion Calendar:
January 4, 2019**

14 The United States of America hereby moves for a stay of pending deadlines in the above-
15 captioned case.

16 1. At the end of the day on December 21, 2018, the appropriations act that had been
17 funding the Department of Justice expired and appropriations to the Department lapsed. At this
18 time the Department does not know when funding will be restored by Congress.

19 2. Absent an appropriation, Department of Justice attorneys are prohibited from
20 working, even on a voluntary basis, except in very limited circumstances, including
21 “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

1 3. Undersigned counsel for the Department of Justice, therefore, requests a stay of
2 all pending deadlines until Congress has restored appropriations to the Department, including the
3 Department's January 9, 2019 deadline to respond to the Court's December 3, 2018 show cause
4 order.

5 4. If this motion for a stay is granted, undersigned counsel will notify the Court as
6 soon as Congress has appropriated funds for the Department. The Government requests that, at
7 that point, all current deadlines be extended commensurate with the duration of the lapse in
8 appropriations.

9 Dated this 27th day of December, 2018.

10 Respectfully submitted,

11 ANNETTE L. HAYES
12 United States Attorney for the
13 Western District of Washington

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CERTIFICATE OF SERVICE

I certified that on December 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

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Dated this 27th day of December, 2018.

s/ Brittany Cirineo
Brittany Cirineo, Legal Assistant (Contractor)